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23 Attorneys for Plaintiff

24 **UNITED STATES DISTRICT COURT**
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE
27 MEMORIAL HOSPITAL, INC. (doing
28 business as “Sage Memorial Hospital”); an
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
PLAINTIFF’S TIME TO RESPOND TO
DEFENDANTS’ MOTION TO DISMISS
(FIRST REQUEST)**

Pursuant to Federal Rule of Civil Procedure 6 and the Court's Local Rule of Civil Practice 7-1, the parties hereby stipulate, subject to the Court's approval, to permit Plaintiff additional time, to and until November 1, 2021, to respond to Defendant's motion to dismiss which was previously filed on August 23, 2021 (ECF No. 147). Presently, Plaintiff's response is due today, September 23, 2021. This is Plaintiff's first request for an extension of time for the reasons cited herein.

In support of this Stipulation, the parties agree to the following:

1. Good cause exists to support this request for additional time. Plaintiff's counsel represent they have been working diligently on a response to the pending dispositive motion but due to recent circumstances will not be able to timely complete a response. Specifically, during the past 2-weeks, both Kathleen Bliss, Esq. and Douglass Mitchell, Esq. have experienced significant issues related to the health and well-being of family members that has required their attention. Additionally, Paul S. Padda, Esq. who has also been working on the response, has been required to prepare for a trial expected to commence next month in state court.

2. Counsel for the respective parties have discussed this request for extension and agree that an extension of time to and until November 1, 2021 is appropriate under the circumstances. The parties further agree that Defendants shall have 30-days following Plaintiff's filing of a response within which time to file a reply.

The parties respectfully request the Court approve this Stipulation.

/s/ Kris Leonhardt

/s/ Paul S. Padda

Pavneet S. Uppal, Esq.
Kris Leonhardt, Esq.
Brian L. Bradford, Esq.

Kathleen Bliss, Esq.
Paul S. Padda, Esq.
David Stander, Esq.
Douglass A. Mitchell, Esq.

Counsel for all named Defendants

Counsel for Plaintiff

Dated: September 23, 2021

Dated: September 23, 2021

IT IS SO ORDERED.

Dated this 24 day of September, 2021

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: _____

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